

HONORABLE DAVID. G. ESTUDILLO

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON AT TACOMA

JANICE HENNESSEY,

Plaintiff,

vs.

AMERICREDIT FINANCIAL SERVICES
INC. DBA GM FINANCIAL, HOBLIT
AUTOMOTIVE, INC. DBA HOBLIT
CHEVROLET BUICK GMC,

Defendants.

) Case No. 3:24-cv-05145-DGE

)

) **STIPULATED MOTION AND**
) **PROPOSED ORDER TO EXTEND TIME**
) **TO REPLY TO DEFENDANTS'**
) **RESPONSE TO MOTION FOR RELIEF**
) **AND CONTINUE MOTION**

) **NOTE ON MOTION CALENDAR:**

) **OCTOBER 15, 2024**

)

)

)

)

)

STIPULATED MOTION

COME NOW, the parties, by and through their counsel of record, and submit the following stipulated motion and proposed order to extend the time for Plaintiff to file a Reply to Defendants' Joint Response to Plaintiff's Motion for Relief from Order and Judgement & Request for Indicative Ruling Under Rule 62.1(A) (DKT. #54). This Motion is noted for October 21, 2024, making the current deadline for the Plaintiff to file a Reply by the same date of October 21, 2024. The parties stipulate and request the deadline to be extended 7 days to October 28, 2024. The grounds for this motion are as follows:

Due to unexpected health matters and not feeling well, Plaintiff requires an additional 7

STIPULATED MOTION AND PROPOSED
ORDER TO EXTEND TIME TO REPLY TO
DEFENDANTS' RESPONSE TO MOTION
FOR RELIEF – NOTE ON MOTION
CALENDAR – OCTOBER 15, 2024 - 1

Janice Hennessey, Pro Se Plaintiff
855 Trosper Road SW, #108-157
Tumwater, WA 98512
Tel. 415-676-8711
Email: janicehennessey2015@gmail.com

1 days to properly prepare her reply. The parties have conferred, and the Defendants have
 2 graciously agreed to the stipulated request for the extension. Plaintiff proposes to extend her
 3 deadline to October 28, 2024, with the motion being noted on the same date. Plaintiff also
 4 agrees to limit her reply brief to 2,100 words, pursuant to LCR 7(e)(4).

5 Pursuant to Local Civil Rule 7(j), the Court may, for good cause, extend the deadlines for
 6 filings. Plaintiff's request is based on medical/health issues, which have limited her ability to
 7 meet the original filing deadline. Defendants have agreed to the extension, contingent on
 8 Plaintiff's adherence to the word count limit contained in LCR 7(e)(4), and no party will be
 9 prejudiced by this short delay.
 10

11 For the reasons set forth above, Plaintiff respectfully requests that the Court approve this
 12 stipulated motion and issue an order extending the deadline for Plaintiff's Reply to October
 13 28, 2024, and noting the motion for the same date.

14 IT IS SO STIPULATED this 15th day of October, 2024.

15 By: s/ Janice Hennessey
 16 JANICE HENNESSEY, Pro Se Litigant
 17 Email: janicehennessey2015@gmail.com
 18 855 Trosper Road SW, #108-157
 19 Tumwater, WA 98512
 Telephone: 415-676-8711

By: s/ Binah B. Yeung
 BINAH B. YEUNG, WSBA #44065
 Attorney for Defendant GM Financial
 524 2nd Avenue, Ste. 500
 Seattle, WA 98104-2323
 Phone: 206-587-0700
 Email: byeung@cairncross.com

20 By: s/ Megan M. Coluccio
 21 MEGAN M. COLUCCIO, WSBA #44178
 22 ROBERT L. CHRISTIE, WSBA #44178
 Attorneys for Hoblit Automotive, Inc.
 23 2100 Westlake Avenue N. Suite 206
 Seattle, WA 98109
 Phone: 206-957-9669
 24 Fax: 206- 352-7875

25 STIPULATED MOTION AND PROPOSED
 ORDER TO EXTEND TIME TO REPLY TO
 DEFENDANTS' RESPONSE TO MOTION
 FOR RELIEF – NOTE ON MOTION
 CALENDAR – OCTOBER 15, 2024 - 2

Janice Hennessey, Pro Se Plaintiff
 855 Trosper Road SW, #108-157
 Tumwater, WA 98512
 Tel. 415-676-8711
 Email: janicehennessey2015@gmail.com

Email: megan.coluccio@bakersterchi.com

Email: bob.christie@bakersterchi.com

I certify that this memorandum contains 289 words, in compliance with the Local Rules Civil Rules.

ORDER

Based upon the foregoing Stipulation,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the deadline for the Plaintiff to file a Reply to Defendants' Joint Response to Plaintiff's Motion for Relief from Order and Judgement & Request for Indicative Ruling Under Rule 62.1 (A) is extended until and including October 28, 2024.

DONE IN OPEN COURT this 16th day of October, 2024.



HONORABLE DAVID G. ESTUDILLO
United States District Court Judge

Presented By:

By: s/ Janice Hennessey
JANICE HENNESSEY, Pro Se Litigant
Email: janicehennessey2015@gmail.com
855 Trosper Road SW, #108-157
Tumwater, WA 98512
Telephone: 415-676-8711

By: s/ Binah B. Yeung
BINAH B. YEUNG, WSBA #44065
Attorney for Defendant GM Financial
524 2nd Avenue, Ste. 500
Seattle, WA 98104-2323
Phone: 206-587-0700
Email: byeung@cairncross.com

By: s/ Megan M. Coluccio

STIPULATED MOTION AND PROPOSED
ORDER TO EXTEND TIME TO REPLY TO
DEFENDANTS' RESPONSE TO MOTION
FOR RELIEF – NOTE ON MOTION
CALENDAR – OCTOBER 15, 2024 - 3

Janice Hennessey, Pro Se Plaintiff
855 Trosper Road SW, #108-157
Tumwater, WA 98512
Tel. 415-676-8711
Email: janicehennessey2015@gmail.com

1 MEGAN M. COLUCCIO, WSBA #44178
2 ROBERT L. CHRISTIE, WSBA #44178
3 *Attorneys for Hoblit Automotive, Inc.*
4 2100 Westlake Avenue N. Suite 206
5 Seattle, WA 98109
6 Phone: 206-957-9669
7 Fax: 206- 352-7875
8 Email: megan.coluccio@bakersterchi.com
9 Email: bob.christie@bakersterchi.com
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

25 STIPULATED MOTION AND PROPOSED
ORDER TO EXTEND TIME TO REPLY TO
DEFENDANTS' RESPONSE TO MOTION
FOR RELIEF – NOTE ON MOTION
CALENDAR – OCTOBER 15, 2024 - 4

Janice Hennessey, Pro Se Plaintiff
855 Trosper Road SW, #108-157
Tumwater, WA 98512
Tel. 415-676-8711
Email: janicehennessey2015@gmail.com

CERTIFICATE OF SERVICE

I, Janice Hennessey, hereby certify that I caused a copy of the foregoing to be served on the parties listed below, via the Court's CM/ECF System on October 15, 2024.

Binah Yeung byeung@cairncross.com
Cairncross & Hempelmann, P.S.
524 Second Ave., Ste. 500
Seattle, WA 98104
main: 206-587-0700
fax: 206-587-2308

Attorney for Defendant AmeriCredit Financial Services dba GM Financial

Robert Christie bob.christie@bakersterchi.com
Megan Coluccio megan.coluccio@bakersterchi.com
Laura Pfeifer laura.pfeifer@bakersterchi.com
Baker Sterchi Cowden & Rice LLC
2100 Westlake Ave. N., Ste. 206
Seattle, WA 98109
main: 206-957-9669
fax: 206-352-7875

Attorneys for Defendant Hoblit Automotive, Inc., d/b/a Hoblit Chevrolet Buick GMC

Dated: October 15, 2024

Janice Hennessey

Janice Hennessey, Pro Se Appellant
Email: janicehennessey2015@gmail.com
855 Trosper Road SW, #108-157
Tumwater, WA 98512
Telephone: 415-676-8711

STIPULATED MOTION AND PROPOSED
ORDER TO EXTEND TIME TO REPLY TO
DEFENDANTS' RESPONSE TO MOTION
FOR RELIEF – NOTE ON MOTION
CALENDAR – OCTOBER 15, 2024 - 5

Janice Hennessey, Pro Se Plaintiff
855 Trosper Road SW, #108-157
Tumwater, WA 98512
Tel. 415-676-8711
Email: janicehennessey2015@gmail.com